

COPIED 100% ACCURATE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN REECH,

Defendant.

CASE NO.: 00-6039-CR-WPD

Assigned to: Judge Dimitrouleas

CLERK OF COURT
U.S. DISTRICT COURT
S.D. OF FLA.-FLL

FILED BY
03 MAR -3 PM 2:21



**AGREED MOTION PERMITTING TELEPHONE REPORTING
IN LIEU OF PERSONAL APPEARANCE TO PRE-TRIAL
SERVICES OFFICER
AND
DISCONTINUE URINE DRUG SCREENS PENDING SENTENCING**

Defendant, JONATHAN REECH, through undersigned counsel, with the consent and approval of Assistant United States Attorney, Jeffrey Kaplan, moves the court for an Order amending the conditions of the Defendant's personal surety bond, and permitting telephone reporting in lieu of personal appearances to the Defendant's Pre-Trial Services Officer, Gavin Churchhill, and discontinuing urine drug screens pending sentencing, and in support thereof would show:

1. At the Defendant's initial appearance and bond hearing, held February 23, 2000, Magistrate Seltzer was apprised of and approved, as a special condition of bond, that the Defendant may



live and work in the state of California, as the Defendant was scheduled to relocate to Palm Desert, California on March 20, 2000. Both Assistant United States Attorney, Jeffrey Kaplan, and Pre-Trial Services Officer, Gavin Churchhill, have and had no objection to this relocation.

2. On February 23, 2000, Defendant entered his GUILTY pleas to the one count information and sentencing is scheduled for May 5, 2000, at 1:30 p.m.
3. That Pre-Trial Services Officer, Gavin Churchhill, has recommended that he continue as the Pre-Trial Service officer over the Defendant as the closest United States Pre-Trial Services Office to Palm Desert, California, is located in Los Angeles, a two and one half hour drive.
4. By March 20, 2000, the Defendant will have successfully completed at least three urine/drug screens and will have made four personal appearances before Pre-Trial Services Officer, Gavin Churchhill.

Accordingly, with the consent and approval of both Assistant United States Attorney, Jeffrey Kaplan, and Pre-Trial Services Officer, Gavin Churchhill, the Defendant respectfully requests that the Court amend the conditions of bond to authorize the Defendant to report to Pre-Trial Services

Officer, Gavin Churchhill, by telephone, on a weekly basis, in lieu of a personal appearance, and to waive the bond requirement of weekly urine/drug screens, effective March 20, 2000 through and including the Defendant's date of sentencing.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail, to all counsel and parties or record as shown on the attached Service List, this 25th day of February, 2000.

MANDINA & GINSBERG, P. A.

Attorneys for Defendant
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By: _____

MARC R. GINSBERG

cc: Gavin Churchhill
Pre-Trial Services Officer
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